CDC Public Health Law News Collection of Assessment Information
Supporting Statement

OMB No. 0920-0798

March 11, 2009

Rachel Weiss, JD
Public Health Analyst
Public Health Law Program
Office of Strategy and Innovation
Office of the Director
Centers for Disease Control and Prevention
1600 Clifton Road, Room 10108, MS D30
Atlanta, GA 30333
ph: 404.639.5031
fax: 404.639.7121
elo3@cdc.gov

***CDC Public Health Law News*—Collection of Assessment Information**

A. Justification

1. Circumstances Making the Collection of Information Necessary

On January 9, 2009, CDC received OMB approval for the generic concept of health marketing (Health Marketing, 0920-0798) to provide feedback on the development, implementation, and satisfaction regarding public health services, products, communication campaigns, and information.

Under Health Marketing, OMB has agreed to expedite review of proposals for data collections for survey/informative materials development and customer satisfaction surveys only. OMB will generally review such request within ten business days.

Background

The CDC Public Health Law Program (PHLP), located in the Office of the Director, has compiled, written, and published the *CDC Public Health Law News*, first daily, then weekly, now monthly, since July 2003. The publication was established as an internal document, as a way to distribute information about legal developments in public health as reported in the mainstream media to interested CDC staff. The publication quickly increased in content and readership, expanding beyond the Agency. The *CDC Public Health Law News* is now distributed by email, RSS, and Internet to over 11,658 readers in over 30 nations. The subscriber base is continually growing. A typical issue is 3,000-4,000 words in length, and contains announcements; abstracted news reports of important or novel uses of law to promote public health and safety; links to other noteworthy news reports, court opinions, and journal articles; and a regular feature, such as "Law Behind the News," which highlights an important statute, judicial opinion, or other legal action from one of the news reports.

The *CDC Public Health Law News* is one component of a larger platform, the CDC Public Health Legal Preparedness Clearinghouse (Clearinghouse), which comprises all public health legal information and training resources generated and disseminated by PHLP.

The *CDC Public Health Law News* and Clearinghouse website support PHLP's mission to "improve the health of the public through law" by reaching a wide variety of readers, including public health officials and attorneys, state legislators and judges, educators in law and in many public health and healthcare fields, experts in private firms and businesses, and non-profit organizations. *CDC Public Health Law News* and Clearinghouse staff has collected anecdotal evidence that these legal professionals use information presented in the publication to monitor and assess legal developments in other jurisdictions for adaptation to their own. The *CDC Public Health Law News* supports the CDC mission by providing information to decisionmakers so that they can

more effectively promulgate statutes, regulations, and policies to "prevent and control disease, injury, and disability." *CDC Public Health Law News* content spans a wide range of health topics, legal issues, and jurisdictions, and reflects PHLP's commitment to each Health Protection Goal. Evaluation of the publication and subscribers' public health legal clearinghouse needs will ensure they meet the customer and partner priorities, build CDC's brand, and contribute to the health impact goals.

PHLP, with the encouragement of Center for Terrorism Preparedness and Emergency Response (COTPER) grantors, has identified a need to survey the subscribers of the *CDC Public Health Law News.*

Authorization to conduct this study is contained in the Public Health Service Act (42 U.S.C. § 241) Section 301.

Privacy Impact Assessment

The Privacy Act does not apply to this data collection. No identifiable information will be collected on or retrieved by individuals.

Overview of the Data Collection System

Data collection for assessment of *CDC Public Health Law News* readers will consist of one, 25-question web-based questionnaire. Questions are either multiple-choice or write-in.

PHLP will conduct the survey, and will store resulting data for only the duration of the survey.

Items of Information to be Collected

The types of information to be collected include information about the respondent's field of practice and sector of employment. Questions about the respondent's use of the publication predominate.

No information in identifiable form (IIF) is being collected.

Identification of Website and Website Content Directed at Children Under 13 Years of Age

The IC does involve web-based data collection but does not refer respondents to websites. Respondents are not referred to any websites with content directed at children less than 13 years of age.

2. Purpose and Use of Information Collection

In order to ensure future development and expansion of the *CDC Public Health Law News* and the Clearinghouse website, it is critical to obtain feedback from subscribers to understand who uses them, how they use them, how satisfied they are with the products, and solicit suggestions on ways to improve each product to bolster satisfaction. As part of this effort, we request approval of an Internet-based form distributed to current subscribers of the *CDC Public Health Law News*. Data collected from this effort will allow PHLP to answer critical operating questions, including:

- Does information provided via the platform impact public health in local, state, tribal, federal, territorial, and international jurisdictions?
- Which audiences receive information on public health and law from the platform, and which are the most critical target audiences?
- How do subscribers representing different work sectors utilize information delivered by the platform?
- How satisfied are subscribers with the content and delivery of the information?
- Are there ways to enhance the platform for use by subscribers through improvements to current offerings or through new products / services?

Without the collection of this information, PHLP and *CDC Public Health Law News* staff has no way to systematically evaluate the publication's impact, and no clear direction about how the publication and website might better benefit readers.

Privacy Impact Assessment Information

The purpose of this project is to evaluate the content, processes, and channels through which CDC communicates emergency legal preparedness and public health legal preparedness information to partners and subscribers. Responses will help ensure that health impact is maximized through the delivery of timely, effective, and credible information, which will result in optimal benefit for public health. The evaluation will help ensure that the platforms meet subscriber and partner priorities, build CDC's brand, and contribute to health impact goals. Feedback from the subscriber base is necessary to fully evaluate the performance of CDC's platforms.

This project is focused on two communication platforms owned and managed by CDC which transmit information primarily intended for emergency planning, public health, and legal professional audiences. The content in these platforms is often accessible to the general public, but the content is written and disseminated primarily for use by those working in the field of public health law, including: public health officials; emergency planners; federal, state, and local decisionmakers; and healthcare professionals.

Information generated by this data collection will be used to evaluate the utility of content provided by the *CDC Public Health Law News* and associated Clearinghouse. We intend to use survey results to determine how different work sectors use the information provided in the *News*; which public health legal and emergency preparedness topics are

of most interest to readers; which types of information sources are most important (e.g. news reports, court opinions, journal articles); and how much of a direct impact information disseminated by the *News* and Clearinghouse have on the health of the public and in which jurisdictions.

There is no sensitive information being collected, and the proposed data collection will have little or no effect on the respondent's privacy.

No IIF is being collected.

3. Use of Improved Information Technology and Burden Reduction

In order to place fewer burdens on the respondent, we will use a web-based survey. We have attempted to keep the format of the survey simple with short questions and clearly labeled scaled answer choice-sets and no multi-part questions.

The web-based surveys will be administered on the CDC database server and data collected will be automatically delivered to PHLP. For almost all questions, the respondent will click on a radio button that corresponds to their response. One question requires the respondent to rank choices. For the few open-ended questions, the respondent would type a response in the space provided. (Attachment 2, *CDC Public Health Law News* Subscriber Survey)

4. Efforts to Identify Duplication and Use of Similar Information

Subscriber information for the *CDC Public Health Law News* has not previously been collected. Upon subscription to the platform, consumers are required only to provide their names and email addresses -- not enough information to garner the results PHLP requires. Since this is a unique publication with a unique subscriber base, there will be no duplication of data collection activities. This is a unique data collection specifically for the use of the staff of the Public Health Law Program.

5. Impact on Small Businesses or Other Small Entities

There is no burden on small businesses or small entities. Platform subscribers would voluntarily respond to the survey. Survey questions have been held to the absolute minimum required for the intended use of the data.

6. Consequences of Collecting the Information Less Frequently

Respondents only include current subscribers to the *CDC Public Health Law News* and participation is entirely voluntarily. This is a one-time request; therefore, it is not possible to ask subscribers to fill out the survey less frequently. There are no legal obstacles to reduce the burden.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances with this information collection package. This request fully complies with the guidelines of 5 CFR 1320.5

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A. The 60-day Federal Register Notice (FRN) for 0920-0798 was published in the Federal Register on May 14, 2008, Vol. 73, No. 94, and pp.27833-27834. The 30-day FRN was published on July 24, 2008, Vol. 73, No. 143, pp. 43241-43242. No public comments were received. (See Attachment 3)

B. No consultation has been sought with persons outside the agency. This is a unique data collection that does not relate to any other federal program.

9. Explanation of Any Payment or Gift to Respondents

There will be no remuneration to respondents.

10. Assurance of Confidentiality Provided to Respondents

No IIF is being collected.

News subscribers will be informed in both the email notice asking them to participate in the survey and the survey instructions that "The data you provide will be treated in a secure manner and will not be disclosed, unless otherwise compelled by law."

This data collection will not collect any information containing personal identifiers. This data collection will be completely anonymous, although the collection will use IIF to facilitate the collection of response data. Specifically, subscribers will be asked to visit the web-based survey and log into the secure site using subscriber's email address and password consisting of the first four letters of subscriber's surname. However, the IIF used to facilitate the collection of response data will not be linked to the data itself. No cookies will be collected.

<u>IRB Approval</u>

This project does not require IRB approval.

<u>Privacy Impact Assessment Information</u>

A. This data collection is not subject to the Privacy Act because it does not collect sensitive information or information in identifiable form.

B. Respondents will access the survey instrument using their email address and a password consisting of the first four letters of their surname. They will be directed on how to add data to the survey instrument. Once respondents input their answers, the information will be briefly stored on the CDC server, and will be subsequently removed and stored both on and offsite. Files will be backed up daily. Methods will be in place to ensure least privilege.

C. The survey is voluntary, and subscribers must "opt in" to complete the survey by clicking a link delivered via email to access the survey. The email invitation (Attachment 1) will clearly state the survey is voluntary. The email invitation will also clearly state that the intended uses of the data are to determine the publication's critical target audiences, determine how users utilize information delivered by the platform, and determine how the platform might be modified to better serve the public's health. The email invitation will further inform respondents that the information they provide will be used by Public Health Law Program staff only. Those who do not wish to complete the survey can simply ignore the request. All data collected will be stored in a database on PHLP computers following the survey's completion and will not contain any personal identifiers.

D. Respondents will be informed about the voluntary nature of their response in the email solicitation.

11. Justification for Sensitive Questions

There are no questions that could be considered sensitive such as questions about sexual behavior and attitudes, religious beliefs, alcohol or drug use, race/ethnicity, or other matters commonly considered private. In the event a respondent finds any question to be objectionable, the respondent can easily skip that question.

12. Estimates of Annualized Burden Hours and Costs

A. We intend to conduct a sample survey of the *News* subscriber base, which presently includes 11,658 individual email addresses. We estimate that the response rate to the web-based survey will be 50%. The survey will take approximately 12 minutes to complete. This estimate has been calculated by testing the survey with a limited number of staff within each platform to ensure accuracy and appropriate brevity.

Estimated Annualized Burden Hours

Type of Respondent	**No. of Respondents**	**No. Responses per Respondent**	**Average Burden per Response (in hours)**	**Total Burden Hours**
Subscriber	583	1	12/60	116.6

B. We estimate the annualized cost to respondents for the 116.6 burden hours for the collection of information will be $6337.21.

Estimated Annualized Burden Costs

Type of Respondent	No. of Respondents	No. Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Subscriber (public health attorney)	583	1	12/60	116.6	$54.35	$6337.21

13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

There are no additional costs to the respondents.

14. Annualized Cost to the Federal Government

Survey design, website design, and data analysis will be conducted by two PHLP staff members, a GS-11 Public Health Analyst and a contract employee. CDC labor cost for the oversight of this project is 5% of annual salary of a Public Health Analyst, or $3,200 and 3% of annual salary of the contract employee, or $3,900. The total cost of this project to the government is $7,100. The cost involves the labor hours for survey design, survey development, and organizing and analyzing the data collected.

15. Explanation for Program Changes or Adjustments

This is new data collection.

16. Plans for Tabulation and Publication and Project Time Schedule

The data collected will be analyzed to inform changes to a CDC platform. This information is for internal use only and will not be published.

Activity	Time Schedule
Survey link emailed to subscribers of platform	1 week following OMB approval
Survey ends / begin data analysis	4 weeks following OMB approval
Report findings to PHLP platform	10 weeks following OMB approval

17. Reasons(s) Display of OMB Expiration Date is Inappropriate

Exemption is not being sought.

18. Exceptions to Certification for Paperwork Reduction Act Submission

There are no exceptions to certification.